Mr. James F. Lang
Fowler Specialty Packaging, Inc.
P.O. Box 692
Fowler, IN 47944

Re: **007-14433**
Second Administrative Amendment to
Part 70 007-7645-00010

Dear Mr. Lang:

Fowler Specialty Packaging, Inc. was issued a Part 70 Operating Permit on March 30, 1998 for a stationary paper and allied products printing source. A letter requesting a change was received on May 31, 2001. The source is adding one (1) flexographic tail printer, identified as TP-48, to the existing source. This tail printer has the potential to emit 4.29 tons per year of VOC, which is less than ten (10) tons per year. Therefore, a minor source modification, pursuant to 326 IAC 2-7-10.5(d) is not required for this modification. See page 1 of 1 of Appendix A of this letter for detailed calculations. Since this approval is for a change in descriptive information and does not trigger new applicable requirements or violate a permit term, this permit is being modified by an administrative amendment pursuant to 326 IAC 2-7-11(a)(8). An analysis of rules that can be applicable is as follows:

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

This modification is not subject to the requirements of 326 IAC 8-1-6 because the potential VOC emissions are less than twenty-five (25) tons per year.

326 IAC 8-2 (Surface Coating Emission Limitations)

Although the actual emissions of VOC from the one (1) flexographic tail printer can exceed fifteen (15) pounds per day, the requirements of 326 IAC 8-2 are not applicable to this modification because the new facility is not a surface coating facility and the facility is not described by any requirements in 326 IAC 8-2.

326 IAC 8-5-5 (Miscellaneous Operations; Graphic Arts Operations)

Pursuant to 326 IAC 8-5-1, the requirements of 326 IAC 8-5-5 can be applicable to the new facility because it is being constructed after November 1, 1980 in Benton County. The one (1) flexographic tail printer is not subject to the requirements of 326 IAC 8-5-5, because the potential emissions from this printing press are less than twenty-five (25) tons per year. The requirements of 326 IAC 8-5-5 is not applicable to the entire source because the source was constructed in 1952, which is prior to November 1, 1980, in Benton County. Therefore, the applicability of 326 IAC 8-5-5 is evaluated by facility.

326 IAC 12, 40 CFR 60.430, Subpart QQ

The one (1) flexographic tail printer, identified as TP-48, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430, Subpart QQ), because it is a flexographic printing press, not a rotogravure printing press.

326 IAC 20, 40 CFR 63.820, Subpart KK

Pursuant to 40 CFR 63.820, the requirements of Subpart KK are applicable to facilities which are major sources of hazardous air pollutants (HAPs), with some provisions applicable to facilities which must be limited to be area sources of HAPs. The one (1) flexographic tail printer, identified as TP-48, is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, 40 CFR 63.820, Subpart KK), because it has the potential to emit less than ten (10) tons per year of each individual hazardous air pollutant (HAP) and the potential to emit less than twenty-five (25) tons per year of any combination of HAPs.

The Technical Support Document to the First Minor Permit Modification 007-12289-00010, issued on August 21, 2000, explains that another flexographic tail printer, identified as TP-49, was added to the source, but was not added to the permit because it is an insignificant activity with no applicable rules. The one (1) new flexographic tail printer, identified as TP-48, is also an insignificant activity with no applicable rules. However, upon request of Fowler Specialty Packaging, Inc., these facilities have been added to the description of the other tail printers at this source. The changes to the permit are as follows, with deleted language as strikeouts and new language bolded. Pursuant to the provisions of 326 IAC 2-7-11, the permit is hereby administratively amended as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) One (1) rotogravure - printing press, seven chamber/color utilizing solvent based inks, with a maximum line speed of five-hundred (500) feet per minute and a maximum print width of twenty-eight and twenty-five hundredths (28.25) inches, exhausting to two (2) stacks (S_5 and S_8);

(2) One (1) flexographic printing press, identified as press No. 3, utilizing water based inks, with a maximum line speed of two-hundred fifty (250) feet per minute and a maximum print width of twenty-two (22) inches, exhausting to two (2) stacks (S_2 and S_3);

(3) One (1) flexographic printing press, identified as press No. 4, utilizing water based inks, with a maximum line speed of five-hundred (500) feet per minute and a maximum print width of thirty-one (31) inches, exhausting to two (2) stacks (S_2 and S_3);

(4) One (1) flexographic printing press, identified as press No. 5, utilizing water based inks, with a maximum line speed of five-hundred (500) feet per minute and a maximum print width of forty-six (46) inches, exhausting to one (1) stack (S_4); and

(5) One (1) flexographic printing press, identified as press No. 6, with a maximum line speed of one thousand (1,000) feet per minute and a maximum print width of 20 inches; and exhausting to one (1) stack (S_{17}).

(6) ~~Nine (9)~~ **Eleven (11)** flexographic tail printers, identified as **TP-48 and TP-49 and** tuber machines No. 50 through No. 58, utilizing water based inks, with a maximum line speed of two

hundred fifty (250) feet per minute**, each,** and a maximum print width of twenty-eight (28) inches, **each,** exhausting to the plant atmosphere.

SECTION D.6 FACILITY OPERATION CONDITIONS

~~Nine (9)~~ **Eleven (11)** flexographic tail printers, identified as **TP-48 and TP-49 and** tuber machines No. 50 through No. 58, utilizing water based inks, with a maximum line speed of two hundred fifty (250) feet per minute**, each,** and a maximum print width of twenty-eight (28) inches, **each,** exhausting to the plant atmosphere.

D.6.1 Volatile Organic Compounds (VOC)

(a) The potential volatile organic compound emissions from each of the **eleven (11)** ~~nine (9)~~ flexographic tail printers, identified as **TP-48 and TP-49 and** tuber machines No. 50 through No. 58, is less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

(b) Any change or modification to the **eleven (11)** ~~nine (9)~~ flexographic tail printers,identified as **TP-48 and TP-49 and** tuber machines No. 50 through No. 58, that would lead to an increase in any criteria pollutant emissions, as specified in 326 IAC 2-1 must be approved by the Office of Air ~~Management~~ **Quality (OAQ)** ~~(OAM)~~ before such change or modification can occur.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact CarrieAnn Ortolani, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
CAO/MES
cc: File - Benton County
U.S. EPA, Region V
Benton County Health Department
Air Compliance Section Inspector - Eric Courtright
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY*

Fowler Specialty Packaging, Inc.
407 South Adeway Road
Fowler, Indiana 47944

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T007-7645-00010	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: March 30, 1998 Expiration Date: March 30, 2003

First Significant Permit Modification 007-9795, issued on June 2, 1999
First Administrative Amendment 007-11025, issued on August 23, 1999
First Minor Permit Modification 007-12289, issued on August 21, 2000

Second Administrative Amendment 007-14433	Pages Affected: 5 and 38a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

*As of January 1, 2001, the name of the Office of Air Management (OAM) has been changed to the Office of Air Quality (OAQ). All references to Office of Air Management (OAM) should be read as Office of Air Quality (OAQ).

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary paper and allied products printing operation.

Responsible Official:	Richard L. Happ
Source Address:	407 South Adeway Road, Fowler, Indiana 47944
Mailing Address:	P. O. Box 692, Fowler, Indiana 47944
SIC Code:	2671
County Location:	Benton
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) One (1) rotogravure - printing press, seven chamber/color utilizing solvent based inks, with a maximum line speed of five-hundred (500) feet per minute and a maximum print width of twenty-eight and twenty-five hundredths (28.25) inches, exhausting to two (2) stacks (S_5 and S_8);

(2) One (1) flexographic printing press, identified as press No. 3, utilizing water based inks, with a maximum line speed of two-hundred fifty (250) feet per minute and a maximum print width of twenty-two (22) inches, exhausting to two (2) stacks (S_2 and S_3);

(3) One (1) flexographic printing press, identified as press No. 4, utilizing water based inks, with a maximum line speed of five-hundred (500) feet per minute and a maximum print width of thirty-one (31) inches, exhausting to two (2) stacks (S_2 and S_3);

(4) One (1) flexographic printing press, identified as press No. 5, utilizing water based inks, with a maximum line speed of five-hundred (500) feet per minute and a maximum print width of forty-six (46) inches, exhausting to one (1) stack (S_4); and

(5) One (1) flexographic printing press, identified as press No. 6, with a maximum line speed of one thousand (1,000) feet per minute and a maximum print width of 20 inches; and exhausting to one (1) stack (S_{17}).

(6) Eleven (11) flexographic tail printers, identified as TP-48 and TP-49 and tuber machines No. 50 through No. 58, utilizing water based inks, with a maximum line speed of two hundred fifty (250) feet per minute, each, and a maximum print width of twenty-eight (28) inches, each, exhausting to the plant atmosphere.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6; and

(2) One (1) 5.23 million British thermal units per hour (mmBtu/hr) natural gas or fuel oil No. 2 fired boiler.

SECTION D.6 FACILITY OPERATION CONDITIONS

Eleven (11) flexographic tail printers, identified as TP-48 and TP-49 and tuber machines No. 50 through No. 58, utilizing water based inks, with a maximum line speed of two hundred fifty (250) feet per minute, each, and a maximum print width of twenty-eight (28) inches, each, exhausting to the plant atmosphere.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Volatile Organic Compounds (VOC)

(a) The potential volatile organic compound emissions from each of the eleven (11) flexographic tail printers, identified as TP-48 and TP-49 and tuber machines No. 50 through No. 58, is less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

(b) Any change or modification to the eleven (11) flexographic tail printers, identified as TP-48 and TP-49 and tuber machines No. 50 through No. 58, that would lead to an increase in any criteria pollutant emissions, as specified in 326 IAC 2-1 must be approved by the Office of Air Quality (OAQ) before such change or modification can occur.

Compliance Determination Requirements

D.6.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) limit specified in Condition D.6.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.3 Monitoring

Monitoring of this facility is not specifically required by this permit. However, any change or modification to this facility, as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

Appendix A: Federal Emissions Calculations
VOC From Printing Press Operations

Company Name: **Fowler Specialty Packaging, Inc.**
Address City IN Zip: **407 South Adeway Road, Fowler, Indiana 47944**
Approval No.: **007-14433**
Plt ID: **007-00010**
Reviewer: **CarrieAnn Ortolani/MES**
Date: **May 31, 2001**

THROUGHPUT

Press ID	MAXIMUM LINE SPEED FEET PER MINUTE	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000	MMin^2/YR	MMin^2/HR
TP-48	250	12	28	60	8760	1000000	44150	5

INK VOCS

Ink Name Press ID	Maxium Coverage lbs/MMin^2	Weight % Volatiles*	Flash Off %	Through Put MMin^2/Year	Tons 2000 lbs	PTE VOC Tons per Year
RBB25981 Flexo PW 902 Blue	2.547	2.25%	100.00%	44150	2000	1.27
Isopropyl Alcohol	0.038	100%	100.00%	44150	2000	0.84
Water	0.193	0%	100.00%	44150	2000	0.00
Maximum as applied	2.778	7%	100.00%	44150	2000	**4.29**

*VOC = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weights % organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
The source provided a maximum possible weight percent VOC of 7%. This is greater than the maximum calculated weight percent, due to a safety factor, and is conservative.
NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.